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**IN THE THIRD JUDICIAL DISTRICT COURT OF
SHAWNEE COUNTY, KANSAS
Division 8**

STATE OF KANSAS, <i>ex rel.</i>)	
DEREK SCHMIDT, Attorney General,)	
)	
Plaintiff,)	
v.)	
)	
SHAWN PARCELLS, an individual;)	
d/b/a PARCELLS REGIONAL FORENSIC SERVICES;)	Case No.: 2019- CV-233
d/b/a KANSAS FORENSIC EXPERTS;)	
d/b/a KANSAS FORENSICS;)	
d/b/a KANSAS FORENSICS AND TISSUE)	
RECOVERY SERVICES; <i>et al</i>,)	
)	
Defendants.)	
)	

(Pursuant to K.S.A. Chapter 60)

FIRST AMENDED PETITION

COMES NOW the Plaintiff, State of Kansas, *ex rel.* Derek Schmidt, Kansas Attorney General, by and through counsel, Melanie Jack, Assistant Attorney General, and for its cause of action against Shawn Parcels, (“Defendant Parcels”) an individual, d/b/a Parcels Regional Forensic Services; d/b/a Kansas Forensic Experts; d/b/a Kansas Forensics; d/b/a Kansas Forensics and Tissue Recovery Services; Parcels Forensic Pathology Group, LLC, a corporation; d/b/a Parcels Forensics; ParCo – Parcels and Company, LLC, a corporation; National Autopsy and Tissue Recovery Services, Inc., a Kansas

corporation; d/b/a National Autopsy and Tissue Recovery Service(s); National Autopsy Services, LLC, a corporation; and National Forensic Autopsy and Toxicology Services, LLC; a corporation, d/b/a National Forensic Autopsy and Tissue Recovery Services; (collectively “Defendants”) alleges and states as follows:

PARTIES

1. Derek Schmidt is the duly appointed, qualified, and acting Attorney General of the State of Kansas.

2. The Attorney General’s authority to bring this action is derived from the statutory and common law of the State of Kansas, specifically the Kansas False Claims Act, K.S.A. §75-7501, *et seq.* (“KFCA”) and the Kansas Consumer Protection Act, K.S.A. §50-623, *et seq.* (“KCPA”).

3. At all times relevant hereto, the Kansas Consumer Protection Act has prohibited each of the Defendants, as suppliers, from engaging in and soliciting deceptive and unconscionable consumer transaction.

4. Defendant Parcels, is an individual with a residential address believed to be in Johnson County, KS. He may be served with process wherever he may be found.

5. Parcels Forensic Pathology Group, LLC, was registered with the Kansas Secretary of State on June 15, 2010, but was forfeited on July 15, 2014.

6. ParCo – Parcels and Company, LLC, was registered with the Kansas Secretary of State on September 30, 2013, but was forfeited on July 15, 2015.

7. Defendant National Autopsy and Tissue Recovery Services, Inc., is a Kansas corporation incorporated on May 11, 2016. It was forfeited on July 15, 2019. Its primary business address is 827 S. Topeka Blvd, Topeka, KS, 66612.

8. National Autopsy and Tissue Recovery Services, Inc., may be served through its resident agent Eric Kjorlie, 827 S. Topeka Blvd, Topeka, KS, 66612.

9. Defendants entered into an oral agreement with Wabaunsee County Coroner, Dr. Diana Katt, to perform coroner ordered autopsies for Wabaunsee County, KS, beginning in 2012.

10. Defendants presented false or fraudulent claims for payment to Wabaunsee County, KS, for completion of fourteen (14) coroner ordered autopsies from 2012-2015 using these business entities: Parcels Forensic Pathology Group; Parcels Regional Forensic Services; Parcels Forensics; Kansas Forensic Experts; Kansas Forensics; Kansas Forensic and Tissue Recovery Services; ParCo - Parcels and Company; National Forensic Autopsy and Tissue Recovery Services; and National Autopsy and Tissue Recovery Services – Forensic Medical Consultants; and National Autopsy and Tissue Recovery Service.

11. Defendant Parcels is in exclusive control of each of the above named entities. He is responsible for the day-to-day business operations and decisions. He is the alter ego of each of the above named entities.

12. Defendant Parcels holds the title of President and Officer of National Autopsy and Tissue Recovery Services, Inc.

13. Defendant Parcels, personally and as an individual, conducted the day-to-day business and transaction decisions of all the above referenced entities.

14. Defendants conducted purported “autopsies” in a rented building at 516 SW 3rd Street, Topeka, KS.

15. Beginning at least as early as January 2012 to the present, Defendants, using various names, have advertised and solicited consumer transactions by maintaining a website,

www.nationalautopsyservices.com, to solicit sales of products and services related to autopsies, tissue recovery and forensic pathology.

16. All references to Defendants herein include acts individually, in concert, or by or through employees, agents, representatives, affiliates, assignees and successors and the named businesses.

NATURE OF ACTION

17. Under the Kansas False Claims Act (“KFCA”), K.S.A. §75-7501 *et seq.*, the State brings this action for injunctive relief, damages, refund of money falsely obtained, civil penalties, attorney fees and costs.

18. Under the Kansas Consumer Protection Act (“KCPA”), §K.S.A. 50-623 *et seq.*, the State brings this action for injunctive relief, civil penalties, consumer restitution, expenses incurred by the Receiver, Dr. Lee Norman, Secretary, Kansas Department of Health and Environment, reasonable expenses and investigative fees.

19. The Kansas legislature enacted the Kansas False Claims Act, K.S.A. §75-7501, *et seq.* to create a civil cause of action for perpetrating an intentional and fraudulent claim upon the State government and any political subdivision thereof.

20. These intentional and fraudulent acts prohibited by the KFCA include, but are not limited to, knowingly making a false claim for payment and making or using a false record or statement for payment or approval. K.S.A. §75-7503.

21. Violations of the KFCA are subject to civil proceedings initiated by the Office of the Kansas Attorney General pursuant to K.S.A. §75-7504.

22. Upon information and belief, the State alleges Defendants knowingly made and presented false or fraudulent claims for approval in the form of invoices for payment or approval to employees,

officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §§75-7503(a)(1) & (2).

23. At all times relevant hereto, the Kansas Consumer Protection Act has prohibited Defendants, as suppliers, from engaging in unconscionable acts or practices in connection with a consumer transaction, including the solicitation of a consumer transaction.

JURISDICTION AND VENUE UNDER THE KFCA & KCPA

24. All of the foregoing paragraphs are hereby incorporated by reference.

25. The Court has subject matter jurisdiction over this controversy under the Kansas False Claims Act, K.S.A. §75-7501, *et seq.* specifically K.S.A. §75-7504.

26. Defendants are subject to the jurisdiction of the Court under the Kansas Consumer Protection Act, specifically K.S.A. §50-638(a).

27. Venue is proper in the Third Judicial District, Shawnee County, pursuant to K.S.A. §75-7510 and K.S.A. §50-638(b), where Defendants can be found and transact business.

28. Under the Kansas False Claims Act, §75-7505(a) this action is within the statute of limitations having been filed within three years of the date of discovery and not more than 10 years after the violation was committed, whichever occurs last.

29. The State of Kansas is not required to post bond in order to be granted a temporary restraining order. K.S.A. 60-905(b).

**INVESTIGATION INTO VIOLATIONS OF
KANSAS FALSE CLAIMS ACT, K.S.A. §75-7501 *et seq.* and
KANSAS CONSUMER PROTECTION ACT, §50-623 *et seq.***

30. All of the foregoing paragraphs are hereby incorporated by reference.

31. On or about May 2017, the Consumer Protection Division of the Office of the Kansas Attorney General (“the CP Division”) began investigating Defendant Shawn Parcels and his companies

regarding consumer protection violations and false claims for payments for autopsy, pathology and other related services performed for Wabaunsee County, KS from 2012 to 2015.

32. From 2012 and 2015, Dr. Diana Katt, was the long time Wabaunsee County Coroner, appointed pursuant to K.S.A. §22a-215 *et seq.* As coroner, it was her responsibility to investigate a death and order an autopsy, according to statute.

33. Dr. Katt was responsible for completion of the death certificates related to her duties as Wabaunsee County Coroner. K.S.A. §22a-231. Dr. Katt is not a pathologist.

34. When a pathologist completes an autopsy at the request of a coroner, the pathologist is required to file a copy of the report with the coroner and with the Clerk of the District Court of the county in which the decedent died. K.S.A. §22a-233(d).

35. From 2012-2015, Dr. Diana Katt, the Wabaunsee County coroner, verbally contracted with Defendants to complete coroner ordered autopsies.

36. Defendant Parcels represented to Dr. Katt that his business contracted with pathologists to perform coroner ordered autopsies and prepare autopsy reports.

37. Defendant Parcels has no formal education, degree or license in the healing arts. He is essentially a self-taught pathology assistant.

38. Coroner ordered autopsies shall be performed by a “qualified pathologist” designated by the coroner. K.S.A. §22a-233.

39. “Autopsy” is not defined in Kansas’ statutes. Black’s Law Dictionary, 2nd Ed., defines an autopsy as:

The dissection of a dead body for the purpose of inquiring into the cause of death.

40. An autopsy is conducted to determine the manner and cause of death.

41. The Child Death Review Board statutes state a “pathologist” means a forensic pathologist, if available. Otherwise, “pathologist” means a physician licensed to practice medicine and surgery and qualified to conduct an autopsy. K.S.A. §22a-241.

42. The pathologist performing the autopsy is required to collect and store tissue or specimens as necessary in the determination of the cause of death as required under K.S.A. §22a-233(c).

DR. ZHONGXUE HUA

43. At all relevant times, Defendants consulted with Zhongxue Hua, MD, a pathologist who resides outside the State of Kansas and who is not licensed to practice medicine in Kansas.

44. Dr. Hua submitted at least four (4) invoices to Wabaunsee County and was paid as a “consulting” pathologist for coroner ordered autopsies. Dr. Hua was paid to review and report on tissue slides.

45. Dr. Hua was not present during the coroner ordered autopsies and relied upon the written “autopsy” report prepared by Defendants when he prepared his report several months after the death.

DR. EDWARD FRIEDLANDER

46. At all relevant times, Defendants contracted with Edward Friedlander, MD, a pathologist who is licensed to practice medicine in Kansas. Dr. Friedlander’s name appears on four (4) “autopsy” reports prepared by Defendants.

47. Dr. Friedlander did not bill Wabaunsee County and was not paid for his services, if any.

48. Dr. Friedlander allowed Defendants to prepare the “autopsy report” and on all occasions did not medically review and approve the “autopsy report” prior to release.

49. Dr. Friedlander’s signature does not appear on any of the “autopsy reports” generated by Defendants that identify Dr. Friedlander as the pathologist.

50. At all relevant times, Defendants were paid by Wabaunsee County, KS, general funds. In the case of a death of a child under the age of 18 years, the autopsy fee is paid to the county general fund from a district coroners fund authorized under K.S.A. §22a-242. All such funds meet the definition of “claim” and “political subdivision” under the KFCA, K.S.A. §75-7502(b) & (c).

51. Defendants submitted invoices, bills and claims in the amount of \$16,560.00 to Wabaunsee County, KS for payment for autopsies, pathology and other related services purportedly authorized by the coroner, Dr. Diana Katt, Wabaunsee County Coroner, pursuant to K.S.A. §22a-233(a).

52. Defendants knowingly presented a false or fraudulent claim for payment or approval by making, using or causing to be made a false record or statement to the Wabaunsee County, KS, for payment for coroner ordered autopsies in violation of the KFCA, K.S.A. §75-7503.

53. Defendants were paid for at least fourteen (14) coroner ordered autopsies that were not performed according to the coroner statutes. K.S.A. §22a-201 *et seq.*

KANSAS CONSUMER PROTECTION ACT, K.S.A. §50-623, et seq.

54. All of the foregoing paragraphs are hereby incorporated by reference.

55. Defendants conduct private autopsies typically at funeral homes, outside a medical setting and without the presence of witnesses.

56. Consumers signed an “Authorization for Autopsy” which purports to give Defendants authorization and consent from next of kin to perform an autopsy.

57. These “autopsies” are conducted without the presence or assistance of a licensed and qualified pathologist.

58. Defendants issued final “autopsy” reports which are given various titles including, but not limited to “Pathophysiological and Epidemiological Report” and included an opinion on the cause and manner of death.

59. Pathologists names are included in the “autopsy” reports, however they were not present at the time of the “autopsy” and therefore did not direct or supervise the examination and did not offer a qualified medical opinion on the manner and cause of death.

60. All “autopsy” reports are issued on Defendants letterhead.

61. Post nominal letters are the letters placed after a person’s name to indicate that person’s position, academic degree, accreditation or office. Defendant Parcels has listed the following post nominal letters:

Shawn Lynn Parcels, BS, MSHAPI, PA, PhD-C
Forensic Clinical Anatomist
Chief Medical Investigator
Board Eligible Forensic, Neuro and Infectious Disease Epidemiologist

62. The letters “PA” likely refer to pathology assistant, but is often confused with physician assistant, a degree in the healing arts. Defendant Parcels does not have this degree or any degree in the healing arts.

63. The above titles used by Defendant Parcels are not conferred by any education in any healing art.

64. Consumers believed Defendants had the medical qualifications and licensure necessary to conduct an autopsy and offer a medical opinion on the cause and manner of death. Defendants failed to correct these misrepresentations or willfully concealed, suppressed or omitted these material facts.

65. Defendants conducted the purported “autopsies” including removal of tissue in the United States between approximately 2012-2019.

66. Some consumers believed Defendant Parcels was a Professor because of misrepresentations he was “Professor Lynn.” Defendant Parcels middle name is Lynn.

67. Typically the title “professor” requires a doctoral degree and requires employment as a full-time, tenure-track university professor.

68. Investigation has revealed Defendant Parcells’ does not hold a doctorate degree and not entitled to use the title professor.

69. To date the Consumer Protection Division of the Office of Kansas Attorney General has received at approximately eighty-five (85) consumer complaints or inquiries about Defendants which establish a pattern and practice of deceptive and unconscionable consumer transactions for accepting payment for private “autopsies” which were not conducted by a licensed and qualified pathologist.

SOLICITATION OF CONSUMER TRANSACTIONS

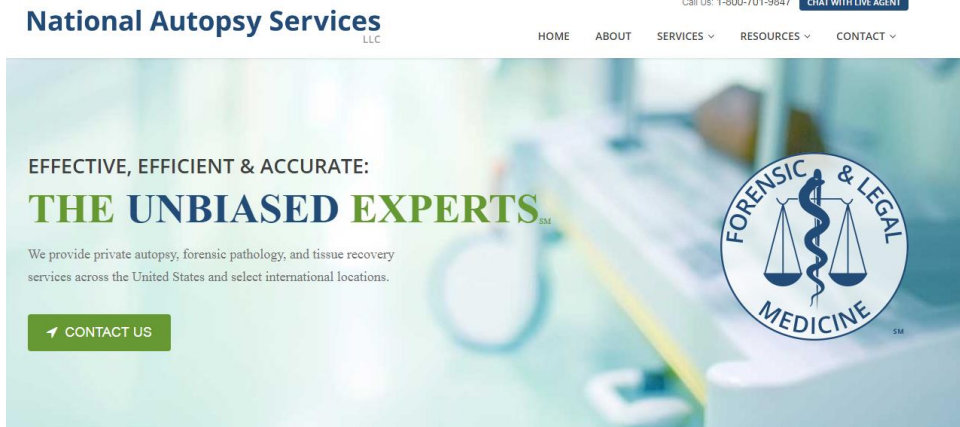
70. Defendants’ website www.nationalautopsyservices.com advertises, solicits and offers for sale products and services including private autopsies, tissue recovery and forensic services.

71. Defendants conduct “autopsies” at 516 SW 3rd Street, Topeka, KS. Reports generated by Defendants contain the address 514 SW 3rd Street, Topeka, KS. The 514 SW 3rd Street address is the alley adjacent to the building at 516 SW 3rd Street.

72. Defendants website misrepresents Defendants have facilities for private autopsies across the United States and internationally. These locations are mostly funeral homes where Defendants, employees or agents have conducted purported private “autopsies.”

73. Defendants are using fictitious addresses when conducting consumer transactions and solicitation of consumer transactions.

74. Beginning at least in 2017, Defendants used social media to post statements, photos and videos, which misrepresent Defendants licensure, qualifications and education to conduct autopsies, tissue recovery and forensic pathology.



75. Defendants falsely advertise on the website that it partners with pathologists and other licensed and qualified medical professionals to provide the products and services offered.

76. The Office of the Attorney General determined it is the pattern and practice of Defendants to offer and perform private autopsies and pathology services without the required licensure, qualifications and education of a pathologist.

77. Defendants misrepresent contracts, agreements or partnerships with persons qualified to conduct autopsies. These representations are deceptive acts and practices. KCPA, K.S.A. §50-626.

78. Solicitation of a consumer transaction based upon misrepresentations is a violation of the KCPA, K.S.A. §50-626.

KANSAS FALSE CLAIMS ACT, K.S.A. §75-7502, et seq.

79. All of the foregoing paragraphs are hereby incorporated by reference.

80. All autopsies requested by the Wabaunsee County coroner are considered forensic autopsies intended to establish the cause and manner of death and required to be conducted by a qualified pathologist. K.S.A. §22a-233.

81. Defendant Parcels provided a sworn statement to the Office of the Attorney General on January 11, 2018. He was questioned regarding claims made and bills paid by Wabaunsee County to his companies for completion of coroner ordered autopsies and “autopsy reports.”

82. Defendant Parcells acknowledged occasions where no reports were prepared to document a coroner ordered “autopsy” but Defendants billed Wabaunsee County for all “autopsy” services.

83. Defendants were paid for all coroner ordered “autopsies” billed to Wabaunsee County.

84. Defendant Parcells acknowledged he conducted many of these “autopsies” without the presence and supervision of a qualified pathologist.

85. Defendants falsely represented to Wabaunsee County officials and others that Defendants were qualified to conduct coroner ordered autopsies.

86. Defendants failed to correct misrepresentations about Defendants lack of medical qualifications to perform coroner ordered autopsies.

87. At all relevant times, Defendants falsely represented to Wabaunsee County officials that pathologists would be present to conduct coroner ordered autopsies. Defendants failed to correct this misrepresentation.

ALLEGATIONS COMMON TO ALL COUNTS

88. All of the foregoing paragraphs are hereby incorporated by reference.

89. At all times relevant hereto, Defendants acted as a “person” in Kansas, as that term is defined by K.S.A. §75-7502(d).

90. At all times relevant hereto, Defendants made or caused to be made “claims” for payment, as that term is defined by K.S.A. §75-7502(b).

91. At all times relevant hereto, Defendants made or caused to be made claims for payment to a “political subdivision” in Kansas, including Wabaunsee County, KS, as that term is defined by K.S.A. §75-7502(c).

92. At all times relevant hereto, Defendants “knowingly” made the aforementioned claims for payment, as that term is defined by K.S.A. §75-7502(e).

93. Individual persons, businesses and corporations are prohibited from making false claims to political subdivisions. K.S.A. §75-7503(a).

94. At all relevant times hereto, Defendants conducted business and represented it offered licensed and qualified autopsy, pathology and other related services.

95. At all times relevant hereto, Defendants made or caused to be made false records or statements to get false or fraudulent claims paid or approved by Wabaunsee County, KS.

96. At all times relevant hereto, every bill and claim submitted to Wabaunsee County, KS for autopsy, pathology and other related services purportedly performed and completed for Wabaunsee County by Defendants were paid from funds drawn from the Wabaunsee County general fund.

97. At all times relevant, and in the ordinary course of business, Defendants acted as a “supplier” as defined by K.S.A. §50-624(l).

98. At all times relevant, and in the ordinary course of business, Defendants engaged in “consumer transactions” as defined by K.S.A. §50-624(c).

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 1

M.B. Date of Death: February 15, 2015

99. All of the foregoing paragraphs are hereby incorporated by reference.

100. Defendants knowingly presented two (2) false or fraudulent claims for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

101. Defendants knowingly made, used or caused to be made or used two (2) false records or statements to get false or fraudulent claims paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(2).

102. On or about March 1, 2015, Defendants submitted an invoice for \$850.00 in fees associated with a coroner ordered autopsy and related services conducted regarding the death of M.B. to Wabaunsee County, KS, for a purported autopsy and other related services conducted at the request of the Wabaunsee County coroner.

103. Defendants were paid \$850.00 on or about February 28, 2015, for these services.

104. On or about May 3, 2015, Defendants submitted a second invoice for \$700.00 for a “coroner autopsy fee” and toxicology fee regarding the death of M.B. to Wabaunsee County, KS, for a purported coroner ordered autopsy and toxicology testing conducted at the request of the Wabaunsee County coroner.

105. Defendants were paid \$700.00 on or about May 31, 2015, for these services.

106. No pathologist billed or was paid for services related to this case.

107. No autopsy services were performed by a qualified pathologist.

108. The “autopsy” report is entitled “Office of the Medical Investigator” and does not identify a pathologist and does not offer a qualified medical opinion on the manner and cause of death.

109. Wabaunsee County was billed and paid for toxicology testing which was not completed.

110. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 2

C.C. Date of Death: December 21, 2014

111. All of the foregoing paragraphs are hereby incorporated by reference.

112. Defendants knowingly presented two (2) false or fraudulent claims for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

113. Defendants knowingly made, used or caused to be made or used two (2) false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(2).

114. On or about December 30, 2014, Defendants submitted an invoice for \$700.00 for an autopsy and related services conducted regarding the death of C.C. to Wabaunsee County, KS, for a purported autopsy and other related services conducted or authorized at the request of the Wabaunsee County coroner.

115. Defendants were paid \$700.00 on or about December 31, 2014, for these services.

116. On or about May 3, 2015, Defendants submitted a second invoice for \$500.00 for a “coroner autopsy fee” regarding the death of C.C. to Wabaunsee County, KS, for a purported autopsy and other related services conducted or authorized at the request of the Wabaunsee County coroner.

117. Defendants were paid \$500.00 on or about May 31, 2015, for these services.

118. Defendant’s “autopsy” report is entitled “Office of the Medical Investigator” on Defendants letterhead and is not signed or dated by a pathologist.

119. No autopsy services were performed by a qualified pathologist. No pathologist billed in this case.

120. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 3

D.C. Date of Death: June 16, 2015

121. All of the foregoing paragraphs are hereby incorporated by reference.

122. Defendants knowingly presented a false or fraudulent claim for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

123. Defendants knowingly made, used or caused to be made or used a false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(2).

124. On or about June 18, 2015, Defendants submitted an invoice for \$1,550.00 for an autopsy and other related services regarding the death of D.C. to Wabaunsee County, KS, for a purported coroner ordered autopsy conducted at the request of the Wabaunsee County coroner.

125. Defendants were paid \$1,550.00 on or about June 30, 2015, for these services.

126. Wabaunsee County was billed and paid for toxicology testing but did not receive a toxicology report.

127. The brain of D.C. was donated to a brain endowment bank at the University of Miami. The “autopsy” report prepared by Defendants refers to an attached “full neuropathology report” from the University of Miami. No such report has been produced. Defendants’ report states that the University of Miami will do the “final case review and sign out per the family’s request.”

128. Defendants’ prepared a report called “Office of the Medical Investigator” for Wabaunsee County which was not signed and not dated. The report does not offer a qualified medical opinion on the manner and cause of death.

129. No autopsy services were performed by a qualified pathologist.

130. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 4

S.F. Date of Death: January 26, 2014

131. All of the foregoing paragraphs are hereby incorporated by reference.

132. Defendants knowingly presented a false or fraudulent claim for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

133. Defendants knowingly made, used or caused to be made or used a false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(2).

134. On or about January 28, 2014, Defendants submitted an invoice for \$700.00 for an autopsy and related services performed regarding the death of S.F. to Wabaunsee County, KS, which fees were related to a purported autopsy conducted at the request of the Wabaunsee County coroner.

135. Defendants were paid \$700.00 on or about January 31, 2014, for these services.

136. The “autopsy report” prepared for Wabaunsee County is on Defendants’ letterhead. The report is not dated and not signed.

137. No autopsy was actually performed by a qualified pathologist.

138. In this case Zhongxue Hua, MD, a “consulting pathologist” prepared and electronically signed a “consultation report” dated June 2, 2014, approximately four (4) months after death.

139. Dr. Hua’s consultation report admits his findings are based on an “autopsy examination” performed by Defendant Parcels. Dr. Hua was not present to perform the “autopsy.”

140. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 5

C.G. Date of Death: October 16, 2013

141. All of the foregoing paragraphs are hereby incorporated by reference.

142. Defendants knowingly presented a false or fraudulent claim for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

143. Defendants knowingly made, used or caused to be made or used a false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(2).

144. On or about October 31, 2013, Defendants submitted an invoice for \$1,200.00 for an autopsy and related services performed regarding the death of C.G. to Wabaunsee County, KS, for a purported autopsy conducted at the request of the Wabaunsee County coroner.

145. Defendants were paid \$1,200.00 on or about October 31, 2013, for these services.

146. Two “autopsy” reports were prepared for Wabaunsee County on Defendants’ letterhead and each were not titled. Neither of the reports are dated or signed. One report consists of two pages and identifies Dr. Vandermark as the Forensic Pathologist. The other report consists of eight pages and identifies Dr. Hua as the Forensic Pathologist.

147. No autopsy was actually performed by a qualified pathologist and the autopsy reports were not prepared or approved by a qualified pathologist

148. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 6

L.G. Date of Death: April 19, 2015

149. All of the foregoing paragraphs are hereby incorporated by reference.

150. Defendants knowingly presented a false or fraudulent claim for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

151. Defendants knowingly made, used or caused to be made or used a false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(2).

152. On or about May 3, 2015, Defendants submitted an invoice for \$1,700.00 for an autopsy and other related services performed regarding the death of L.G. to Wabaunsee County, KS, for a purported autopsy conducted at the request of the Wabaunsee County coroner.

153. Defendants were paid \$1,700.00 on or about May 31, 2015, for these services.

154. Wabaunsee County was billed and paid for toxicology services but no toxicology report was received.

155. The “autopsy report” prepared for Wabaunsee County is on Defendants’ letterhead and entitled “Office of the Medical Investigator.” The report is not dated and not signed and does not offer a qualified medical opinion on the manner and cause of death.

156. No autopsy services were performed by a qualified pathologist.

157. No qualified pathologist billed for services in this case.

158. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 7

G.G. Date of Death: June 10, 2014

159. All of the foregoing paragraphs are hereby incorporated by reference.

160. Defendants knowingly presented a false or fraudulent claim for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

161. Defendants knowingly made, used or caused to be made or used a false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(2).

162. On or about June 13, 2014, Defendants submitted an invoice for \$700.00 for an autopsy and other related services performed regarding the death of G.G. to Wabaunsee County, KS, for a purported autopsy conducted at the request of the Wabaunsee County coroner.

163. Defendants were paid \$700.00 on or about June 30, 2014, for these services.

164. Several “autopsy” reports were prepared for Wabaunsee County on Defendants’ letterhead. The reports are not dated and are not signed.

165. In this case, Zhongxue Hua, MD, a “consulting pathologist” prepared and electronically signed a “consultation report” dated October 9, 2014, approximately four (4) months after death.

166. Dr. Hua’s consultation reports admit his findings are based on an “autopsy examination” performed by Defendant Parcels. Dr. Hua was not present to perform the “autopsy”.

167. No autopsy was actually performed by a qualified pathologist.

168. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATION OF KANSAS FALSE CLAIMS ACT

COUNT 8

P.H. Date of Death: November 14, 2014

169. All of the foregoing paragraphs are hereby incorporated by reference.

170. Defendants knowingly presented two (2) false or fraudulent claims for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

171. Defendants knowingly made, used or caused to be made or used two (2) false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(2).

172. On or about December 1, 2014, Defendants submitted an invoice for \$700.00 in fees associated with an autopsy and related services conducted regarding the death of P.H. to Wabaunsee County, KS, for a purported autopsy and other related services conducted or authorized at the request of the Wabaunsee County coroner.

173. Defendants were paid \$700.00 on or about November 30, 2014, for these services.

174. On or about May 3, 2015, Defendants submitted a second invoice for \$700.00 for an autopsy and related services regarding the death of P.H. to Wabaunsee County, KS, for a purported autopsy conducted at the request of the Wabaunsee County coroner. This invoice was submitted about five (5) months after the date of death.

175. Defendants were paid \$700.00 on or about May 31, 2015, for these services.

176. The “autopsy report” prepared for Wabaunsee County for this case was titled “private autopsy.” A pathologist is not identified anywhere in the report and no pathologist signed the report.

177. The “autopsy report” prepared for Wabaunsee County is on Defendants’ letterhead. The report is not dated and not signed and did not include a qualified medical opinion on the manner and cause of death.

178. No autopsy was performed by a qualified pathologist.

179. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 9

T.M. Date of Death: June 14, 2012

180. All of the foregoing paragraphs are hereby incorporated by reference.

181. Defendants knowingly presented a false or fraudulent claim for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

182. Defendants knowingly made, used or caused to be made or used a false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(2).

183. On or about June 20, 2012, Defendants submitted an invoice for \$1150.00 for an autopsy and other related services regarding the death of T.M. to Wabaunsee County, KS, for a purported autopsy conducted at the request of the Wabaunsee County coroner.

184. Defendants were paid \$1150.00 on or about June 30, 2012, for these services.

185. The “autopsy report” prepared for Wabaunsee County is on Defendants’ letterhead and entitled “Office of the Medical Investigator”. The report is not dated and not signed by Defendant Parcels or Dr. Friedlander.

186. Dr. Friedlander advised this office he may have been present for this autopsy, although he did not review and approve the “autopsy” report prior to issuance.

187. No pathologist billed or was paid for services related to this case.

188. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 10

E.R. Date of Death: January 18, 2014

189. All of the foregoing paragraphs are hereby incorporated by reference.

190. Defendants knowingly presented a false or fraudulent claim for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

191. Defendants knowingly made, used or caused to be made or used a false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(2).

192. On or about January 28, 2014, Defendants submitted an invoice for \$900.00 for an autopsy and other related services regarding the death of E.R. to Wabaunsee County, KS, for a purported autopsy conducted at the request of the Wabaunsee County coroner.

193. Defendants were paid \$900.00 on or about January 31, 2014, for these services.

194. The “autopsy report” prepared for Wabaunsee County is on Defendants’ letterhead. The report is not dated and not signed by Defendant Parcels or a pathologist.

195. In this case Zhongxue Hua, MD, a “consulting pathologist” prepared and electronically signed a “consultation report” dated June 2, 2014, approximately five (5) months after death.

196. Dr. Hua's consultation report admits his findings are based on an "autopsy examination" performed by Defendant Parcels. Dr. Hua was not present to perform the "autopsy".

197. No autopsy was actually performed by a qualified pathologist.

198. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 11

B.S. Date of Death: February 9, 2012

199. All of the foregoing paragraphs are hereby incorporated by reference.

200. Defendants knowingly presented a false or fraudulent claim for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

201. Defendants knowingly made, used or caused to be made or used a false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(2).

202. On or about February 27, 2012, Defendants submitted an invoice for \$1650.00 for an autopsy and other related services regarding the death of B.S. to Wabaunsee County, KS, for a purported autopsy conducted at the request of the Wabaunsee County coroner.

203. Defendants were paid \$1650.00 on or about February 29, 2012, for these services.

204. The "autopsy report" prepared for Wabaunsee County is on Defendants' letterhead and entitled "Office of the Medical Investigator". The report is not dated and not signed by Defendant Parcels or Dr. Friedlander.

205. Dr. Friedlander advised this office he may have been present for this autopsy, although he did not review and approve the “autopsy” report prior to issuance.

206. No pathologist was billed or was paid for services related to this case.

207. Defendants billed and were paid for toxicology testing but no toxicology report was received.

208. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 12

H.S. Date of Death: April 14, 2014

209. All of the foregoing paragraphs are hereby incorporated by reference.

210. Defendants knowingly presented a false or fraudulent claim for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

211. Defendants knowingly made, used or caused to be made or used a false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(2).

212. On or about April 22, 2014, Defendants submitted an invoice for \$700.00 for an autopsy and other related services regarding the death of H.S. to Wabaunsee County, KS, for a purported autopsy conducted at the request of the Wabaunsee County coroner.

213. Defendants were paid \$700.00 on or about May 12, 2014, for these services.

214. The “autopsy report” prepared for Wabaunsee County is on Defendants’ letterhead and is not titled. The report is not dated or signed by Defendant Parcels or Dr. Hua.

215. No autopsy was actually performed by a qualified pathologist.

216. In this case Zhongxue Hua, MD, a “consulting pathologist” prepared and electronically signed a “consultation report” dated October 8, 2014, approximately six (6) months after death.

217. Dr. Hua’s consultation reports admit his findings are based on an “autopsy examination” performed by Defendant Parcels. Dr. Hua was not present to perform the “autopsy”.

218. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, et seq.

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 13

J.W. Date of Death: August 9, 2012

219. All of the foregoing paragraphs are hereby incorporated by reference.

220. Defendants knowingly presented a false or fraudulent claim for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

221. Defendants knowingly made, used or caused to be made or used a false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including to the Wabaunsee County Clerk, Alma, KS, in violation of K.S.A. §75-7503(a)(2).

222. On or about August 13, 2012, Defendants submitted an invoice for \$1,000.00 for an external exam only and other related services regarding the death of J.W. to Wabaunsee County, KS, when the Wabaunsee County coroner ordered a full autopsy.

223. Defendants were paid \$1,000.00 on or about August 31, 2012, for these services.

224. Dr. Friedlander is identified as the pathologist in the “autopsy” report, however he was not present for the “autopsy.”

225. Dr. Friedlander did not review or approve of the “autopsy” report and did not bill Wabaunsee County for his services.

226. Defendants made the decision not to complete an autopsy on J.W., but billed for forensic radiology (x-rays), a forensic *external* exam and a toxicology panel. (emphasis added)

227. Defendants completed a report entitled “Office of the Medical Investigator.” This report included the manner and cause of death, even though Defendants had no pathologist conduct an autopsy.

228. Subsequently, a qualified pathologist completed a full autopsy at the request of the coroner because Defendants had failed to do so.

229. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATIONS OF KANSAS FALSE CLAIMS ACT

COUNT 14

H.W. Date of Death: January 26, 2012

230. All of the foregoing paragraphs are hereby incorporated by reference.

231. Defendants knowingly presented a false or fraudulent claim for approval in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including Wabaunsee County, KS, in violation of K.S.A. §75-7503(a)(1).

232. Defendants knowingly made, used or caused to be made or used a false record or statement to get a false or fraudulent claim paid or approved in the form of an invoice for payment or approval to employees, officers or agents of a political subdivision of the State of Kansas, including to the Wabaunsee County Clerk, Alma, KS, in violation of K.S.A. §75-7503(a)(2).

233. On or about January 27, 2012, Defendants submitted an invoice for \$1160.00 for an autopsy and other related services regarding the death of H.W. to Wabaunsee County, KS, for a purported autopsy conducted at the request of the Wabaunsee County coroner.

234. Defendants were paid \$1160.00 on or about January 31, 2012, for these services.

235. The “autopsy report” prepared for Wabaunsee County is on Defendants’ letterhead and is untitled. One version of this report purports to be signed by Defendant Parcels and Dr. Friedlander. This report is not dated.

236. Dr. Friedlander advised this office that he remembers being present for this autopsy because H.W. had a tumor. He wanted this tumor examined to determine if it impacted the cause of death.

237. The “autopsy” report prepared by Defendants does not identify a tumor. The report specifically denies the presence of a mass or hemorrhage.

238. Dr. Friedlander did not review or approve the “autopsy” report in spite of his purported signature on one version of the “autopsy” report.

239. Dr. Friedlander did not bill and was not paid for services related to this case.

240. Defendants should be held jointly and severally liable for the aforementioned violations of the KFCA, K.S.A. §75-7501, *et seq.*

VIOLATIONS OF KANSAS CONSUMER PROTECTION ACT

COUNT 15

K.S.A. §50-626(b)(2) – Solicitation of Deceptive Acts and Practices

241. All of the foregoing paragraphs are hereby incorporated by reference.

242. Beginning on or about December 22, 2017, Defendants willfully used oral or written representations, exaggeration, falsehood, innuendo or ambiguity as to a material fact by solicitation of consumer transactions misrepresenting Defendants are able to provide autopsy, pathology and medical services when Defendants had no education, license, degree, qualification, affiliation or authority in violation of K.S.A. §50-626(b)(2).

243. Defendants' website www.nationalautopsyservices.com advertises, solicits and offers for sale products and services including private autopsies, pathology, tissue recovery, forensic services, neuroscience services and expert witnesses.

244. At all relevant times Defendants used the internet and social media to post statements, photos and videos, which misrepresent by exaggeration, falsehood, innuendo or ambiguity as to a material fact that Defendants are qualified to conduct autopsies, pathology and other related services.

245. Defendants solicitation of consumer transactions is a continuing deceptive act and practice and each day it exists and is a separate violation of the Kansas Consumer Protection Act. Civil penalties of not more than \$10,000 may be imposed for each violation as provided by K.S.A. §50-636.

246. Defendants should be held jointly and severally liable for the aforementioned violations of the Kansas Consumer Protection Act, K.S.A. §50-623, *et seq.*

VIOLATIONS OF KANSAS CONSUMER PROTECTION ACT

COUNT 16

Deceptive Acts and Practices, K.S.A. §50-626(b)(3)

See attached Exhibit A, Consumer List, incorporated by reference herein.

247. All of the foregoing paragraphs are hereby incorporated by reference.

248. At all relevant times, Defendants knowingly or with reason to know willfully failed to state a material fact, or willfully concealed, suppressed or omitted a material fact in consumer transactions, see Exhibit A, by failing to disclose Defendants are not qualified to provide private autopsies, forensic pathology and tissue recovery in violation of K.S.A. §50-626(b)(3).

249. Defendants' consumer transactions are deceptive acts and practices and are violations of the Kansas Consumer Protection Act. Civil penalties of not more than \$10,000 may be imposed for each violation as provided by K.S.A. §50-636.

250. Thirty-five (35) consumers are protected consumers, see Exhibit A, as defined in K.S.A. §50-676(g). The Court has authority to assess an enhanced civil penalty for a violation of the Kansas Consumer Protection Act against a protected consumer in addition to any civil penalty otherwise provided by law of up to \$10,000, pursuant to K.S.A. §50-677.

251. Defendants should be held jointly and severally liable for the aforementioned violations of the Kansas Consumer Protection Act, K.S.A. §50-623, *et seq.*

VIOLATIONS OF KANSAS CONSUMER PROTECTION ACT

COUNT 17

Unconscionable Acts and Practices, K.S.A. §50-627(b)(3) See attached Exhibit A, Consumer List, incorporated by reference herein.

252. All of the foregoing paragraphs are hereby incorporated by reference.

253. At all relevant times Defendants failed to complete consumer transactions for consumers in Exhibit A, because Defendants are not qualified to perform private autopsies, forensic pathology and tissue recovery services including qualified medical findings or opinions, therefore consumers were unable to receive a material benefit from the subject of the consumer transaction in violation of K.S.A. §50-627(b)(3).

254. Defendants' consumer transactions are unconscionable acts and practices and are violations of the Kansas Consumer Protection Act. Civil penalties of not more than \$10,000 may be imposed for each violation as provided by K.S.A. §50-636.

255. Thirty-five (35) consumers are protected consumers, see Exhibit A, as defined in K.S.A. §50-676(g). The Court has authority to assess an enhanced civil penalty for a violation of the Kansas Consumer Protection Act against a protected consumer in addition to any civil penalty otherwise provided by law of up to \$10,000, pursuant to K.S.A. §50-677.

256. Defendants should be held jointly and severally liable for the aforementioned violations of the Kansas Consumer Protection Act, K.S.A. §50-623, *et seq.*

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

A. Defendants acts and practices be declared a violation of the Kansas False Claims Act, pursuant to K.S.A. §75-7503(a)(1) and K.S.A. §75-7503(a)(2); and be declared deceptive and unconscionable in violation of the Kansas Consumer Protection Act, pursuant to K.S.A. §50-632(a)(1);

B. Defendants be temporarily and permanently enjoined pursuant to the Kansas False Claims Act, K.S.A. §75-7503(a)(1-8) and K.S.A. §60-901 *et seq.*, from performance of any services or submission of any claim to a political subdivision;

C. Defendants be temporarily and permanently enjoined from conducting consumer transactions as defined by K.S.A. §50-624(c) and solicitation of consumer transactions in violation of the Kansas Consumer Protection Act, K.S.A. §50-632(a)(2) and K.S.A. §50-632(c);

D. Defendants and officers, directors, employees, shareholders and agents be temporarily and permanently enjoined from these and other practices in violation of the Kansas Consumer Protection Act, pursuant to K.S.A. §50-632(a)(2) and the Kansas False Claims Act, K.S.A. §75-7503(a);

E. Defendants be temporarily and permanently enjoined from any representation that Shawn Parcels has a medical degree, education or training in the healing arts, including but not limited to, the use of the title doctor, physician, pathologist, forensic pathologist, forensic clinical anatomist, physician assistant or professor, whether by statement, misrepresentation, omission or association, and shall not in any manner represent that defendant Shawn Parcels is qualified to independently conduct an autopsy or independently perform any other pathology services without the direct supervision of a licensed, Board-certified or Board-eligible pathologist;

Defendants be temporarily and permanently enjoined from:

- a. Soliciting or conducting autopsy pathology business in Kansas;
- b. Soliciting or conducting autopsy pathology business anywhere while physically in Kansas;
- c. Review medical records for others;
- d. Maintaining any websites or social media accounts promoting or advertising pathology or autopsy services, or any other service for which Shawn Parcels is not legally competent to perform independently.
- e. Maintaining any websites or social media accounts promoting or advertising Shawn Parcels' qualifications and/or ability to perform forensic pathology or autopsy services, or any other pathology services.

F. Defendants be temporarily and permanently enjoined from offering any services in connection with the human body including but not limited to the healing arts, epidemiology, infectious disease, coronavirus, COVID-19 and any treatment, protocol, diagnosis, medication, opinion, or other recommendation;

G. Defendants be temporarily and permanently enjoined from advertising, soliciting, accepting payment for, contracting, performing, or in any manner conducting business or consumer transactions in the healing arts pursuant to K.S.A. §65-2801, *et seq.*;

H. Defendants be temporarily and permanently enjoined from advertising, soliciting, accepting payment for, contracting, performing, or in any manner conducting business or consumer transactions in epidemiology and infectious disease, including coronavirus and COVID-19;

I. Defendants be temporarily and permanently enjoined from advertising, soliciting, accepting payment for, contracting, performing, or in any manner conducting business or consumer transactions performed by an enrolled agent of the IRS and offering services exclusive to CPAs;

J. Defendants be temporarily and permanently enjoined from advertising, soliciting, accepting payment for, contracting, performing, or in any manner conducting business or consumer transactions related to the examination, review or inspection of human remains and post-mortem, including retrieval of any part of the human body or seek authorization, permission or authority to perform such actions;

K. Defendants be temporarily and permanently enjoined from using titles that include professions in the in healing arts and any other academic designation for which Defendants are not qualified;

L. Defendant Parcels be temporarily and permanently enjoined from using the post nominal initial of “PA” and from using any post nominal initial for which he has not been conferred a recognized academic degree;

M. Defendants pay the State of Kansas civil penalties of \$10,000.00 for each violation of the Kansas Consumer Protection Act, including continuing violations, or such other amount as the Court deems just and equitable pursuant to K.S.A. §50-636;

N. Defendants pay Wabaunsee County three times the amount of damages, \$16,560.00 X 3 = \$49,680.00, sustained because of Defendants acts prohibited under the Kansas False Claims Act, K.S.A. §75-7503(a);

O. Defendants pay the State of Kansas civil penalties of \$10,000.00 for each violation of the Kansas False Claims Act, or such other amount as the Court deems just and equitable pursuant to K.S.A. §75-7503;

P. Defendants pay restitution of two hundred forty-two thousand five hundred six dollars and ninety-eight cents (\$242,506.98) to all known consumers and other consumers known and revealed in the course of discovery;

Q. Defendants pay reasonable expenses and attorney fees in the amount of \$10,000.00 to the Office of the Kansas Attorney General pursuant to Kansas False Claims Act, K.S.A. §75-7503(a);

R. Defendants pay investigation fees of \$20,000.00 to the Office of the Kansas Attorney General pursuant to the Kansas Consumer Protection Act, K.S.A. §50-632(a)(4);

S. Defendants pay the Kansas Department of Health and Environment all expenses related to execution of the Receivership, pursuant to the Kansas Consumer Protection Act, K.S.A. §50-632(c)(4);

T. Defendants shall be held jointly and severally liable for the aforementioned violations of the Kansas Consumer Protection Act, K.S.A. §50-623, *et seq.* and the Kansas False Claims Act, K.S.A. §75-7502, *et seq.*;

M. Defendants pay all court costs;

N. The Court enter such other and further relief as may be warranted by law or equity.

Respectfully submitted,

OFFICE OF THE ATTORNEY GENERAL
DEREK SCHMIDT

____/s/Derek Schmidt_____
Derek Schmidt, #17781
Kansas Attorney General
Office of the Attorney General
Consumer Protection Division
120 SW 10th Ave., 2nd Floor
Topeka, Kansas 66612-1597

/s/ **Melanie Jack**
Melanie Jack, #13213
Assistant Attorney General
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DEMAND FOR JURY TRIAL

Pursuant to Section 5 of the Bill of Rights of the Kansas Constitution, and pursuant to K.S.A. 60-238, Plaintiff hereby demands trial by jury for all issues raised by this pleading which are so triable.

/s/ **Melanie Jack**
Melanie Jack, #13213

Exhibit A, Consumer List
First Amended Petition
State v. Parcels, et al, 2019 CV 233

	Consumers by Initials	Protected Consumer	Restitution Amount
1	C. P.	Yes	\$3,000.00
2	L. S.	Yes	\$2,000.00
3	R. C.	Yes	\$3,500.00
4	S. W.	Yes	\$5,275.00
5	A. M.	Yes	\$2,000.00
6	J. R.	Yes	\$3,390.00
7	L. W.	Yes	\$3,000.00
8	E. M.	Yes	\$3,089.98
9	T. S.	Yes	\$2,575.00
10	A. P.	Yes	\$2,000.00
11	A. G.	Yes	\$3,025.00
12	W. R.	Yes	\$3,650.00
13	J. B.	Yes	\$2,850.00
14	A. C.	Yes	\$3,300.00
15	M.E. M.	Yes	\$3,300.00
16	V. M.	Yes	\$4,500.00
17	D. K.	Yes	\$3,000.00
18	M. C.	Yes	\$2,000.00
19	E. S.	Yes	\$3,800.00
20	R. G.	Yes	\$3,399.00
21	M. C.	Yes	-0-
22	R. H.	Yes	\$3,300.00
23	P. R.	Yes	\$3,800.00
24	A. M.	Yes	\$3,500.00
25	V. D.	Yes	\$3,800.00
26	J. P.	Yes	\$7,000.00
27	B. J.	Yes	\$3,600.00
28	B. G.	Yes	\$3,000.00
29	D. Z.	Yes	\$3,000.00
30	S. T.	Yes	\$3,605.00
31	S. C.	Yes	\$3,800.00
32	J. P.	Yes	\$2,000.00
33	L. I.	Yes	\$3,605.00
34	M. B.	Yes	\$2,900.00
35	I. S.	Yes	\$3,660.00
36	T. M.		\$3,000.00
37	N. B.		\$3,500.00
38	L. L.		-0-
39	C. L.		\$3,605.00

40	C. M.		\$3,545.00
41	D. A.		\$3,100.00
42	A. M.		\$3,800.00
43	K. M.		\$3,100.00
44	P. P.		\$3,235.00
45	L. M.		\$2,250.00
46	O. V.		\$3,500.00
47	B. F.		\$4,000.00
48	T. T.		\$3,450.00
49	D. H.		\$3,000.00
50	R. G.		\$2,266.00
51	M. R.		\$3,535.00
52	B. F.		\$2,500.00
53	K. L.		\$1,500.00
54	L. B.		\$2,500.00
55	V. K.		\$3,399.00
56	B. T.		\$3,200.00
57	N. R.		\$2,600.00
58	L. W.		\$3,000.00
59	C. W.		\$3,500.00
60	K. S.		\$3,200.00
61	J. S.		\$3,500.00
62	W. S.		\$3,339.00
63	J. A.		\$3,900.00
64	K. T.		\$3,850.00
65	A. H.		\$4,000.00
66	M. T.		\$3,605.00
67	K. K.		\$4,000.00
68	L. P.		To be determined
69	P. M.		To be determined
70	R. O.		\$3,000.00
71	O. S.		To be determined
72	K. W.		\$3,500.00
73	M. S.		-0-
74	T. P.		\$3,399.00
75	J. C.		\$3,050.00
76	T. F.		\$4,000.00
77	M. D.		\$1,500.00
78	E. N.		\$3,450.00
79	J. O.		\$3,300.00
80	A. T.		\$3,605.00
81	R. W.		To be determined
82	K. R.		To be determined
		Restitution Total	\$242,506.98